

044633/19344/MHW/JJL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DEANDRE CRAWFORD,

Plaintiff,

v.

WEXFORD HEALTH SOURCES, INC.
(nominal defendant), et al.

Defendants.

Case Number 18-cv-4882

Judge Edmond E. Chang

SUGGESTION OF DEATH OF SALEH OBAISI, M.D., UPON THE RECORD
PURSUANT TO FED. R. CIV. P. 25(A)(1)

NOW COMES Nominal Defendant, WEXFORD HEALTH SOURCES, INC., by and through its attorneys Matthew H. Weller and Joseph J. Lombardo of CASSIDAY SCHADE LLP, and pursuant to Fed. R. Civ. P. 25(a), suggests upon the record the following:

1. Pursuant to Fed. R. Civ. P. 25(a), upon learning of the death of a party, notice shall be made upon the Record of the death.
2. Defendant, SALEH OBAISI, M.D., is deceased.
3. Ghaliah Obaisi (the "Independent Executor") has been appointed the Independent Executor of the Estate of Saleh Obaisi, Deceased. A copy of the Letter of Office of Decedent's Estate confirming the appointment of the Independent Executor is attached hereto as ***Exhibit 1***.
4. Federal Rule of Civil Procedure 25(a)(3) requires that a statement noting death and "A motion to substitute, together with a notice of hearing, must be served...on nonparties as provided in Rule 4."
5. In order to expedite the substitution of party, and minimize the burden to Dr. Obaisi's family, in lieu of personally serving this Suggestion of Death, Motion for Substitution of

Party, and any correlating Notice of Motion, related to Dr. Obaisi, as described under Fed. R. Civ. P. 4, the Plaintiff may personally serve all Suggestions of Death and/or Notices and Motions for Substitution related to Dr. Obaisi, via email at the following address: obaisiestate@gmail.com, with a copy of the email and any attachments thereto, sent to the attorneys of record from Cassiday Schade, LLP, via their listed email address on the CM/ECF system.

6. The Independent Executor will not contest timely service of the Suggestion of Death, Motion for Substitution of Party, and Notice of Motion related to Dr. Obaisi, if timely service is perfected in the manner described in paragraph 5 of this Suggestion of Death. *See* Declaration of Ghalia Obaisi, ¶ 3, attached as ***Exhibit 2***.

Respectfully submitted,

CASSIDAY SCHADE LLP

By: /s/ Joseph J. Lombardo

One of the Attorneys for Nominal Defendant,
WEXFORD HEALTH SOURCES, INC.

Matthew H. Weller/ARDC No. 6278685
Joseph J. Lombardo/ARDC No. 6306466
CASSIDAY SCHADE LLP
222 West Adams Street, Suite 2900
Chicago, IL 60606
(312) 641-3100
(312) 444-1669 – fax
mweller@cassiday.com
jlombardo@cassiday.com

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2018, I electronically filed the foregoing document with the clerk of the court for the Northern District of Illinois, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of E-Filing” to the attorneys of record in this case.

Additionally, service of this Suggestion of Death was made on the Independent Executor via electronic means at the email address of: obaisiestate@gmail.com, with a copy to Dr. Obaisi's attorneys of record from Cassiday Schade, LLP, as requested by the Independent Executor in paragraph 5, above, in lieu of personal service of this Suggestion of Death pursuant to Fed. R. Civ. P. 25(a)(3) and Fed. R. Civ. P. 4.

/s/ Joseph J. Lombardo

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